

LIST OF EXHIBITS AND WITNESSES

Case No.	3:19-cv-00086-SI	U. S. District Judge Michael H. Simon
Title	De Jaray et al	
	Lattice Semiconductor Corporation	
Dates of Hearing/Trial	January 30, 2024 – February 15, 2024	
“	Dennis Apodaca	
Deputy Clerks	Mary Austad	
Isaac Glassman, Joshua A. Berman, Timothy S. DeJong, Rita A. Fishman, and Laura Logsdon		Derek F. Foran, James P. Bennett, Nicholas F. Aldrich, Jr., Jason A. Wrubleski, and Wendy Joy Ray

de Jaray, et al. v. Lattice Semiconductor, Case No. 3:19-cv-86-SI**TRIAL DIARY**

(Revised as of Feb. 14, 2024, 10:00 a.m.)

Ps' Time (30 hrs.) **D's Time (30 hrs.)****Tuesday, January 30, 2024 (Trial Day 1)**

Jury Selection

Preliminary Jury Instructions

Wednesday, January 31, 2024 (Trial Day 2)

Ps' Opening Statement (1 hr. 10 min.)

D's Opening Statement (51 min.)

PW 1 Kirstin Fredrickson	3 hr. 1 min.	46 min.
Daily Totals	3 hr. 1 min.	46 min.
Cumulative Totals	3 hr. 1 min.	46 min.

Thursday, February 1, 2024 (Trial Day 3)

PW 2 Taylor Engers (by deposition)	59 min.	17 min.
PW 3 Thomas Andrukonis	1 hr. 50 min.	1 hr. 4 min.
PW 4 John Berg	1 hr. 22 min.	44 min.
Daily Totals	4 hr. 11 min.	2 hr. 5 min.
Cumulative Totals	7 hr. 12 min.	2 hr. 51 min.

Friday, February 2, 2024 (Trial Day 4)

PW 4 John Berg— <i>continued</i>	3 min.	2 min.
PW 5 Edward Markiewicz (by deposition)	41 min.	2 min.
PW 6 Darrell Oswald	1 hr. 51 min.	1 hr. 13 min.
PW 7 Steven de Jaray	1 hr. 30 min.	-----
Daily Totals	4 hr. 5 min	1 hr. 17 min.
Cumulative Totals	11 hr. 17 min.	4 hr. 8 min.

Monday, February 5, 2024 (Trial Day 5)

PW 7 Steven de Jaray— <i>continued</i>	4 hr. 39 min.	1 hr. 19 min.
Daily Totals	4 hr. 39 min.	1 hr. 19 min.
Cumulative Totals	15 hr. 56 min.	5 hr. 27 min.

Tuesday, February 6, 2024 (Trial Day 6)

PW 7 Steven de Jaray— <i>continued</i>	-----	5 hr. 42 min.
Daily Totals	-----	5 hr. 42 min.
Cumulative Totals	15 hr. 56 min.	11 hr. 09 min.

Wednesday, February 7, 2024 (Trial Day 7)

PW 7 Steven de Jaray— <i>continued</i>	1 hr. 58 min.	17 min.
PW 8 Steve Cerar (by deposition)	19 min.	-----
PW 9 Justin Lewis	1 hr. 38 min.	1 hr. 5 min.
Daily Totals	3 hr. 55 min.	1 hr. 22 min.
Cumulative Totals	19 hr. 51 min.	12 hr. 31 min.

Thursday, February 8, 2024 (Trial Day 8)

PW 10 Byron Milstead (by deposition)	1 hr. 7 min.	6 min.
DW 1 Kirstin Fredrickson	14 min.	6 min.
DW 2 April Zhang (by deposition)	9 min.	1 hr. 10 min.
DW 3 Heather States (by deposition)	13 min.	1 hr. 26 min.
DW 4 Perienne de Jaray (deposition)	5 min.	26 min.
DW 5 Jacob Baker	-----	43 min.
Daily Totals	1 hr. 48 min.	3 hr. 57 min.
Cumulative Totals	21 hr. 39 min.	16 hr. 28 min.

Friday, February 9, 2024 (Trial Day 9)

DW 5 Jacob Baker— <i>continued</i>	40 min.	9 min.
DW 6 Robert Henry	34 min.	47 min.
DW 7 Robert Alvarado	38 min.	41 min.
DW 8 Robert Hale (by deposition)	6 min.	42 min.
DW 9 Susan Chipman (by deposition)	6 min.	24 min.
DW 10 John Keen (by deposition)	11 min.	39 min.
Daily Totals	2 hr. 15 min.	3 hr. 22 min.
Cumulative Totals	23 hr. 54 min.	19 hr. 50 min.

Monday, February 12, 2024 (Trial Day 10)

DW 11 Randy Wood (by deposition)	10 min.	27 min.
DW 12 Ryan Fayhee	2 hr. 16 min.	2 hr. 42 min.
DW 13 Patrick Lamoureux (by deposition)	3 min.	21 min.
Daily Totals	2 hr. 29 min.	3 hr. 30 min.
Cumulative Totals	26 hr. 23 min.	23 hr. 20 min.

Tuesday, February 13, 2024 (Trial Day 11)

DW 14 Scott Roberts (by deposition)	58 min.	1 hr. 2 min.
DW 15 Jennifer Marietta-Westberg	1 hr. 24 min.	1 hr. 0 min.
PRW 1 Steven Skaggs (by deposition)	28 min.	6 min.
PRW 2 Thomas Andukonis (by live video)	8 min.	9 min.
Daily Totals	2 hr. 58 min.	2 hr. 17 min.
Cumulative Totals	29 hr. 21 min.	25 hr. 37 min.
Remaining Time	39 min.	4 hr. 23 min.
Rule 50(a) motions		
Jury instructions discussed		

United States District Court
Exhibits Log: 3:19-cv-00086-SI
de Jaray et al v. Lattice Semiconductor, 1/23/2024

EXHIBIT	DESCRIPTION
Pla-1	Lattice Data Sheet for GAL22V10883 1999
Pla-2	Lattice Data Sheet for ispLSI1048C883 2002
Pla-3	Standard Microcircuit Drawing No. 5962-89841 Revision Level L 2008
Pla-4	Standard Microcircuit Drawing No. 5962-95587 Revision Level B 2008
Pla-5	Lattice Export Control Management and Compliance Program 2010
Pla-8	Email from K. Fredrickson to G. Stafford dated June 21 2010 with attachments
Pla-9	United States Commerce Control List 2008
Pla-10	A Guide to Canadas Export Controls 2006
Pla-11	Lattice Data Sheet for GAL20V8C 2006
Pla-12	Lattice Data Sheet for ispLSI 1016 2000
Pla-13	MIL-STD-883G 2006
Pla-14	MIL-PRF-38535H 2007
Pla-20	Email from N. Preshaw to K. Fredrickson dated June 15 2011 attaching Lattice Settlement Agreement
Pla-22	Email from J. Keen to E. Marklewicz dated October 5 2004
Pla-24	Lattice Reliability and Quality Assurance Manual 2003
Pla-25	Email from S. de Jaray to J. Keen dated September 10 2005
Pla-26	Email from T. Lopes to S. Roberts copying J. Keen dated March 8 2006 with attachments
Pla-29	Email from J. Nichols to J. Anderson copying J. Keen dated December 5 2005
Pla-32	Compilation of Apex Purchase Orders
Pla-37	Email from S. Fauser to S. de Jaray dated July 23 2008 with attached billing invoices
Pla-43	Email from S. de Jaray to S. Roberts dated December 18 2007
Pla-45	Lattice Chart of Customer Apex Micros Historical Product Consumption 2003-2009
Pla-46	Standard Apex Terms and Conditions
Pla-48	Lattice Commercial Invoices and Air Waybill printed February 4 2009
Pla-49	Email from J. Sakelson to S. de Jaray dated March 20 2009 with attachments
Pla-50	ispLSI1048C883 Certificate of Conformance signed by R. Henry on December 18 2008
Pla-53	Email from D. Bennett to S. Roberts dated March 4 2009
Pla-55	Email from S. de Jaray to S. Roberts dated July 14 2008
Pla-57	Email from R. Davarpey to S. de Jaray dated January 22 2009 with attachments
Pla-58	U.S. Dept of Homeland Security FOIA Production dated August 16 2017
Pla-59	Apex Purchase Orders dated December 10 2008
Pla-64	Handwritten notes from Lattice meeting with the Federal Bureau of Investigation dated January 30 2009
Pla-71	Email from K. Varga to K. Fredrickson dated August 29 2011
Pla-72	Email from K. Varga to K. Fredrickson and B. Minstead dated February 5 2010
Pla-74	Indictment of S. de Jaray and P. de Jaray dated April 29 2010
Pla-76	Letter from K. Fredrickson to K. Varga dated November 17 2009
Pla-77	Email from J. Keen to K. Fredrickson dated January 29 2010 with attachments
Pla-80	Email from K. Fredrickson to N. Preshaw dated July 29 2011 with attachments
Pla-82	Email from K. Fredrickson to P. Silvano dated April 26 2013
Pla-83	Email from K. Fredrickson to S. Mohanty dated May 20 2013

EXHIBIT	DESCRIPTION
Pla-84	Email from K. Fredrickson to B. Milstead and M. Gariepy dated January 21 2011
Pla-87	Email from K. Fredrickson to N. Preshaw dated August 29 2011 at 1255 PM
Pla-91	Email from K. Fredrickson to K. Varga dated April 27 2011
Pla-92	Email from K. Fredrickson to B. Milstead dated April 27 2011
Pla-93	Email from K. Fredrickson to B. Milstead and M. Gariepy dated July 8 2011
Pla-95	Email from P. Tinling to K. Fredrickson dated January 26 2011
Pla-96	Email from P. Tinling to K. Fredrickson dated January 10 2011
Pla-100	Letter from K. Elvin-Jensen to D. Martin dated June 21 2012 with enclosures
Pla-101	Email from B. Milstead to K. Varga dated May 5 2010
Pla-102	Letter from B. Milstead to the BIS Office of Export Enforcement dated October 29 2010
Pla-103	Letter from B. Milstead to CBSA dated June 27 2013
Pla-104	Letter from M. Brunet to B. Milstead dated November 6 2013
Pla-105	Letter from B. Milstead to M. Brunet dated November 26 2013
Pla-106	Letter from J. Dupuis to B. Milstead dated December 2 2013
Pla-107	Email from B. Milstead to K. Fredrickson dated July 21 2011
Pla-109	Email
Pla-113	Email from K. Fredrickson to B. Burmester copying Y. Lee dated December 7 2012
Pla-160	Military Test Traveler for IPL1048C-G883 2006
Pla-161	Military Test Traveler for 22V10D-D883 2005
Pla-174	Email from S. de Jaray to S. Cerar dated March 23 2009
Pla-175	Email from J. Allen to K. Fredrickson dated February 22 2010 forwarding email from J. Johannessen to S. Skaggs dated March 28 2006
Pla-177	Canada Customs Coding Form FedEx Entry Recap Sheet Waybill Manifest December 2008
Pla-184	Apex Quality Assurance Policy Manual 2003
Pla-185	Canadian Export Consulting Services Report 2011
Pla-186	Email from P. Lamoureux to S. de Jaray dated November 19 2013
Pla-188	Email from S. de Jaray to D. Oswald dated January 12 2009
Pla-193	Letter from C. Pavlik-Keenan to J. Puracal dated August 16 2017
Pla-195	Email from H. Swartos dated November 14 2008 attaching November 13 2008 MFD Meeting Minutes
Pla-203	Supplement No. 3 to 15 C.F.R. 732 2008
Pla-205	IPL1048C-50LGSD Military Test Traveler 2010
Pla-207	Email from S. de Jaray to S. Roberts dated December 10 2008
Pla-212	Lattice Annual 10K Report Fiscal Year 2004
Pla-227	Press release from CBSA dated May 27 2010
Pla-233	Lattice Commercial Invoices dated February 4 2009
Pla-237	Lattice Semiconductor Data Book 1996
Pla-246	Standard Microcircuit Drawing No. 5969-00538 Revision H 2010
Pla-247	Standard Microcircuit Drawing No. 5962-17211 2010
Pla-258	Email from S. de Jaray to D. Oswald dated January 14 2009 with attachments
Pla-275	Summary of Apex Projected Growth
Pla-276	Apex Shareholder Meeting Minutes dated June 23 2008
Pla-277	Apex Income Statement 20082009
Pla-279	Memorandum from S. de Jaray to D. Oswald dated January 10 2009
Pla-288	Email from C. Watson to S. de Jaray dated June 7 2008

EXHIBIT	DESCRIPTION
Pla-292	Apex Open Accounts Receivable Summary dated March 31 2009
Pla-679	Declaration of Robert Henry
Pla-703	Apex Financial Statements Year Ended May 31 2005
Pla-709	Lattice Thermal Management Technical Note September 2019
Pla-710	Apex Financial Statement dated April 13 2009
Pla-711	Email from S. de Jaray to D. Oswald dated January 15 2009
Def-306	Financial Signature Cards
Def-307	BC Securities Commission Order
Def-311	Email J. Keen to Brio Tech
Def-314	Email chain P. de Jaray J. Grace J. Keen
Def-315	Email chain P. de Jaray J. Grace
Def-316	Email J. Grace to S. Roberts
Def-317	Email chain P. de Jaray J. Grace J. Keen S. Roberts
Def-318	Email chain S. de Jaray S. Roberts J. Keen
Def-320	Purchase Order
Def-321	Email J. Keen to C. Cote and S. Roberts and New Order Request Form
Def-324	Email chain S. de Jaray J. Keen
Def-325	Email T. Huffman to S. Skaggs S. Donovan E. Markiewicz M. Baker S. Roberts
Def-326	Email chain S. Roberts J. Keen
Def-327	Pentar letter
Def-328	Email A. Zhang to S. de Jaray P. de Jaray
Def-330	Email chain J. Harvey P. Lamoureux K. Parmar S. de Jaray
Def-332	Email chain S. de Jaray P. de Jaray
Def-335	Email chain S. de Jaray R. Hale P. Lamoureux C. Watson
Def-336	Purchase Orders
Def-337	Purchase Order
Def-338	Email chain S. Fauser S de Jaray B. Burnett P. de Jaray with Invoices
Def-340	Email A. Zhang to S. de Jaray
Def-341	Email S. de Jaray to R. OBrien
Def-345	Email S. de Jaray to J. Keen
Def-346	Purchase Orders
Def-348	Purchase Orders
Def-349	Email P. de Jaray S. de Jaray D. Manz
Def-350	Email chain D. Manz P. de Jaray J. Keen S. de Jaray
Def-354	Email chain D. Manz S. de Jaray P. de Jaray J. Keen with Shipment and Backlog Table
Def-357	Email chain P. de Jaray S. de Jaray J. Keen D. Manz
Def-358	Email chain S. Chandra W. Ng A. Zhang D. Li S. de Jaray I. Ho J Cheung
Def-360	Email chain D. Manz P. de Jaray J. Keen S. de Jaray
Def-362	Waybills Commercial Invoices Export Declarations
Def-365	Email S. de Jaray to J. Neville C. Watson R. Hale S. Letwin
Def-366	Email chain S. de Jaray A. Zhang
Def-367	Standard Microcircuit Drawing
Def-371	Buying Table and Purchase Orders
Def-372	Standard Microcircuit Drawing

EXHIBIT	DESCRIPTION
Def-373	Email chain D. Manz R. Giese S. Roberts C. Cote
Def-375	Email chain S. de Jaray D. Manz
Def-378	Apex consolidated financial statement
Def-380	Email chain S. de Jaray I. Ho S. Su
Def-381	Email chain S. de Jaray A. Fassold S. Roberts T. Huffman B. Burnett S. Fauser
Def-382	Email S. Mar to P. de Jaray S. de Jaray J. Lee with BOM
Def-386	Email S de Jaray to S. Roberts A. Fassold
Def-393	Email chain S. de Jaray S. Fauser S. Roberts
Def-395	Email S. de Jaray to S. Fauser S. Roberts B. Burnett D. Reardon R. OBrien M. Walsh
Def-396	Email chain S. de Jaray S. Roberts R. Giese
Def-397	Email S. de Jaray to S. Roberts
Def-399	Email chain S. de Jaray I. Ho A. Liang J. Cheung S. Chandra R. Hale C. Watson
Def-401	Email S. de Jaray to G. Weaver D. Knowles. D. Oswald C. Watson
Def-402	Standard Microcircuit Drawing
Def-403	Email R. Hale to S. de Jaray C. Watson
Def-405	Share Purchase Agreement
Def-406	Email S. de Jaray to P. de Jaray and D. Oswald
Def-407	Email chain S. de Jaray S. Chandra C. Ji A. Zhang I. Ho J. Cheung A. Liang C. Watson
Def-409	Email chain S. de Jaray S. Roberts J. Sakelson
Def-411	Email chain S. de Jaray S. Roberts B. Burnett R. Giese S. Fauser J. Sakelson
Def-412	Email chain S. de Jaray S. Roberts B. Burnett R. Giese S. Fauser J. Sakelson
Def-413	Standard Microcircuit Drawing
Def-414	Standard Microcircuit Drawing
Def-416	Standard Microcircuit Drawing
Def-417	Email chain S. de Jaray R. Giese S. Roberts J. Sakelson S. Fauser B. Burnett
Def-420	Standard Microcircuit Drawing
Def-422	Email S. de Jaray to A. Zhang
Def-423	Purchase Orders
Def-426	Commercial Invoice
Def-427	Certificate of Conformance
Def-430	Email chain P. de Jaray S de Jaray C. Watson J. Clay W. Scott
Def-432	Email chain S. de Jaray D. Bennett S. Roberts
Def-435	Email S. de Jaray to S. Roberts with Table
Def-437	Email D. Oswald to S. de Jaray
Def-438	Purchase Orders
Def-441	Email chain I. Ho S. de Jaray with Purchase Order
Def-443	Email chain S. de Jaray M. Walsh S. Roberts B. Burnett Richard Giese
Def-445	Commercial Invoices Certificates of Conformance Pack List
Def-446	Waybills
Def-448	Waybill and Commercial Invoice
Def-449	Waybill and Commercial Invoice
Def-450	Email J. Sakelson to S. de Jaray R. Giese M. Rhodes S. Roberts
Def-453	Email chain S. de Jaray M. Walsh S. Roberts B. Burnett R. Giese
Def-458	Email chain P. Lamoureux S. de Jaray C. Watson S. Mar C. Baker

EXHIBIT	DESCRIPTION
Def-463	Letter S. de Jaray to Canadian Customs
Def-474	Email B. Schonfeld to S. de Jaray
Def-476	Email C. Watson to S. de Jaray
Def-478	
Def-481	Email B. Schonfeld to S. de Jaray
Def-482	Email S. de Jaray to B. Schoenfeld
Def-486	Email chain S. de Jaray M. Walsh
Def-489	Email chain S. Roberts D. Bennett S. de Jaray
Def-491	Email chain S. de Jaray S. Roberts D. Bennett
Def-492	Email chain S. Roberts S. de Jaray
Def-493	Sales Table
Def-504-a	Photographs of Apex facility
Def-504-b	Photographs of Apex facility
Def-504-c	Photographs of Apex facility
Def-504-d	Photographs of Apex facility
Def-504-e	Photographs of Apex facility
Def-504-f	Photographs of Apex facility
Def-504-g	Photographs of Apex facility
Def-504-h	Photographs of Apex facility
Def-510	Email chain S. de Jaray J. Cheung S. Wang A. Liang I. Ho
Def-511	Canadian Search Report
Def-513	Email R. Hale to C. Watson
Def-529	S. de Jaray Affidavit
Def-530	S. de Jaray Affidavit
Def-534	Bank Records Bank of Montreal Apex-Micro Manufacturing
Def-535	Bank Records HSBC Caliber Component Solutions
Def-539	Bank Records Bank of Montreal
Def-554	Email chain K. Varga P. Lamoureux
Def-556	Fax of K. Varga Affidavit
Def-559	Letter D. Martin to O. Meneguzzi and N. Preshaw
Def-563	Settlement and Consent Order
Def-566	Email chain K. Fredrickson Y. Lee with Data Sheets
Def-567	Email chain K. Fredrickson Y. Lee with Data Sheets
Def-568	Email chain K. Fredrickson Y. Lee with Data Sheets
Def-569	Email chain K. Fredrickson Y. Lee with Data Sheets
Def-570	Email chain K. Fredrickson Y. Lee with Data Sheets
Def-571	Email chain K. Fredrickson Y. Lee with Data Sheets
Def-572	BIS Licensing Decisions
Def-582	My Story by S. de Jaray
Def-583	Email chain S. de Jaray D. Oswald
Def-584	Email chain S. de Jaray D. Oswald
Def-603	Photograph
Def-605	Summary Chart - AGC Appx E
Def-606	Sales Table

EXHIBIT	DESCRIPTION
Def-608-a	Photographs of detained shipment
Def-608-b	Photographs of detained shipment
Def-608-c	Photographs of detained shipment
Def-608-d	Photographs of detained shipment
Def-608-e	Photographs of detained shipment
Def-608-f	Photographs of detained shipment
Def-608-g	Photographs of detained shipment
Def-608-h	Photographs of detained shipment
Def-608-i	Photographs of detained shipment
Def-609	Physical exhibit - Ridemaxx Plus 08-09 Touring assembled in box
Def-610	Physical exhibit - Ridemaxx - bag of disassembled components
Def-611	Physical exhibit - Ridemaxx - bag of disassembled components
Def-613	Document Binder B
Def-614	Certificates of Conformance
Def-615	Packing Lists
Def-616	Certificates of Conformance
Def-617	Commercial Invoices
Def-618	Purchase Orders
Def-620	Commercial Invoices
Def-622	Commercial Invoices and Certificates of Conformance
Def-623	Commercial Invoices
Def-626	Commercial Invoices and Waybills
Def-627	Waybills and Commercial Invoices
Def-628	Waybills and Commercial Invoices
Def-631	Waybills and Commercial Invoices
Def-632	Summary Chart - Nancan Orders
Def-636	S. de Jarays Objections and Answers to Lattice First Interrogatories
Def-637	S. de Jarays Responses to Lattice First Interrogatories
Def-640	S. de Jarays Answers to Special Interrogatories
Def-644	S. de Jarays Responses to Lattice Second Interrogatories
Def-645	S. de Jarays Supplemental Responses to Lattice Second Interrogatories
Def-660	Email S. de Jaray P. de Jaray
Def-662	Military test travelers
Def-664	Email Keen to Marklewicz
Def-668	Email S. de Jaray to D. Oswald
Def-669	Email S. de Jaray D. Oswald
Def-671	Federal Register Notice
Def-673	Federal Register Notice
Def-676	Prosecution Brief Canada